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86 Chamber
New York, New York 10007

August 10, 2023

By ECF

The Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Rahsaan Butler v. United States of America*, No. 22 Civ. 1997 (AT)

Dear Judge Torres:

This Office represents the United States of America (the “Government”) in the above-referenced action brought pursuant to the Federal Tort Claims Act (“FTCA”), 28 U.S.C. §§ 1346(b), 2671 *et seq.* We write jointly with Plaintiff Rahsaan Butler (“Plaintiff”) to request a settlement conference in this matter, and to request a 30-day stay of the current discovery deadlines.

The parties are available for a settlement conference on August 28, August 31, September 8, or a subsequent date that is convenient for the Court. Given that the parties are actively engaged in settlement discussions and hope to resolve this matter, we respectfully request that the current discovery deadlines be stayed by 30 days. The discovery deadlines would therefore be revised as follows:

- Completion of fact discovery extended from September 8, 2023, to October 9, 2023;
- Completion of expert discovery extended from October 29, 2023, to November 28, 2023;
- Deadline to request a pre-motion conference extended from September 26, 2023, to October 26, 2023.

This is the parties’ third request for an extension of the discovery deadlines. The parties have exchanged several thousands of pages of relevant documents and the Government has completed the Plaintiff’s deposition. The Government also arranged for an independent medical examination of the Plaintiff at FCI Danbury, which took place on June 28, 2023. The parties are continuing to engage in settlement discussions and believe that there is a greater likelihood of the parties reaching a settlement with the Court’s involvement.

We thank the Court for its consideration of this letter.

Respectfully,

DAMIAN WILLIAMS

United States Attorney

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GRANTED. The Court shall refer the settlement conference to the Honorable Stewart D. Aaron in a separate order.

SO ORDERED.

Dated: August 11, 2023
New York, New York


ANALISA TORRES
United States District Judge